

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

JON HOWARD ROWLAND,)	
)	
Plaintiff,)	
)	
v.)	No.: 3:13-CV-00702
)	Judge: Reeves/Guyton
THE STRAYER UNIVERSITY)	JURY DEMAND
CORPORATION)	
)	
Defendant.)	

**MOTION TO QUASH DEFENDANT’S SUBPOENAS SEEKING PLAINTIFF’S
EMPLOYMENT FILES FROM SIX (6) OF PLAINTIFF’S PREVIOUS EMPLOYERS**

COMES NOW, the Plaintiff, by and through his counsel and in accordance with Federal Rules of Civil Procedure 26 and 45, hereby files this Motion to Quash the Defendant’s subpoenas, served on six (6) of Plaintiff’s previous employers, whom Plaintiff worked for before he was hired by the Defendant. These subpoenas broadly seek identical information of “[a]ll employment related documents and records” from each of Plaintiff’s former employers. (Def.’s Subpoenas, Attached as Exhibit A).

The Plaintiff requests this Honorable Court to Quash the Subpoenas on the grounds that the Defendant’s subpoenas are overly broad, seek irrelevant personal information not related to the subject matter of this litigation, and are not reasonably calculated to lead to the discovery of admissible evidence.

The Plaintiff files a Memorandum in support of this Motion to Quash, simultaneously herewith.

RESPECTFULLY SUBMITTED this 17th day of November, 2014.

BURKHALTER, RAYSON & ASSOCIATES, P.C.

/s/David A. Burkhalter, II
David A. Burkhalter II, BPR #004771
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was served upon counsel of record by either the Court's electronic mail system or by placing same in the United States mail with proper postage affixed thereto this the 17th day of November, 2014.

/s/David A. Burkhalter, II
David A. Burkhalter, II